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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case: 2:22-cr-20006  
Judge: Michelson, Laurie J.  
MJ: Grey, Jonathan J.C.  
Filed: 01-04-2022 At 03:07 PM  
INDI USA V SCOTT SAMS (SS)

SCOTT CHRISTOPHER SAMS,

Defendant.

VIOL: 21 U.S.C. § 846  
21 U.S.C. § 841(a)(1)  
21 U.S.C. § 841(b)(1)(C)

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

21 U.S.C. § 846

*Conspiracy to Commit a Title 21 Offense*

On or about and between January 1, 2020, through on or about November 30, 2021, both dates being approximate and inclusive, in the Eastern District of Michigan and elsewhere, the defendant, SCOTT CHRISTOPHER SAMS, knowingly and intentionally combined, conspired, confederated, and agreed with persons both known and unknown to the Grand Jury, to commit the following offenses against the United States: possession with intent to distribute

methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TWO**

21 U.S.C. §§ 841(a)(1); 841(b)(1)(C)  
*Distribution of Controlled Substances Resulting  
in Serious Bodily Injury and Death*

On or about and between May 20, 2021, through on or about May 21, 2021, both dates being approximate and inclusive, in the Eastern District of Michigan and elsewhere, the defendant, SCOTT CHRISTOPHER SAMS, did knowingly and intentionally distribute a quantity of a mixture and substance containing methamphetamine, a Schedule II controlled substance, resulting in the serious bodily injury and death of R.S., a person whose identity is known to the Grand Jury, in violation of Title 21, United States Code, Sections 841(a)(1); 841(b)(1)(C).

**COUNT THREE**

21 U.S.C. § 841(a)(1)

*Possess with Intent to Distribute Controlled Substances*

On or about and between June 1, 2021, through on or about June 15, 2021, both dates being approximate and inclusive, in the Eastern District of Michigan and elsewhere, the defendant, SCOTT CHRISTOPHER SAMS, did knowingly and unlawfully possess with the intent to distribute a mixture and substance containing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**FORFEITURE ALLEGATION**

21 U.S.C. § 853; 28 U.S.C. § 2461(c)  
*Criminal Forfeiture*

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21 United States Code, Section 853, and Title 28 United States Code, Section 2461(c).

Upon conviction any of the controlled substance offense alleged in Counts One through Three of this Indictment, defendant shall forfeit to the United States, pursuant to Title 21 United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the named violations.

If any of the property described in the paragraphs above as being forfeitable under Title 21, United States Code, Section 853, as a result of any act or omission of the defendant- -

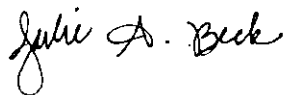
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States of America, pursuant to Title 21, United States Code, Section 853(p), intends to seek forfeiture of all other property of defendant up to the value of the above-described forfeitable property.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson  
Grand Jury Foreperson

DAWN N. ISON,  
UNITED STATES ATTORNEY



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Dated: January 4, 2022

United States District Court  
Eastern District of Michigan

**Criminal Case Cov**

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to comp

**Companion Case Information**

Companion Case Number:

This may be a companion case based upon LCrR 57.10 (b)(4)<sup>1</sup>:

Judge Assigned:

☐ Yes

☒ No

AUSA's Initials: s/MS

Case Title: USA v. SCOTT CHRISTOPHER SAMS

County where offense occurred : Wayne

Check One: ☒ Felony

☐ Misdemeanor

☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.

☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 21-mj-30586 ]

☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_

Judge: \_\_\_\_\_

☐ Corrects errors; no additional charges or defendants.

☐ Involves, for plea purposes, different charges or adds counts.

☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

January 4, 2022

Date

s/Margaret Smith

Margaret Smith  
Assistant United States Attorney  
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Attorney Bar #: P71413

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.